KATHLEEN BLISS 1 Nevada Bar No. 7606 kb@kathleenblisslaw.com KATHLEEN BLISS LAW PLLC 3 170 South Green Valley Parkway Suite 300 4 Henderson, Nevada 89012 Telephone: 702.318.7375 5 6 Attorney for Adam Pacheco 8 UNITED STATES DISTRICT COURT 9 DISTRICT OF NEVADA 10 11 UNITED STATES OF AMERICA, Case No. 2:19-CR-248-RFB-DJA 12 Plaintiff, 13 STIPULATION TO CONTINUE 14 VS. MOTIONS DEADLINES (TENTH 15 REQUEST) ADAM PACHECO, 16 Defendant. 17 18 19 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, 20 21 22

United States Attorney for the District of Nevada, and Christopher Burton, Assistant United States Attorney, and Nadia Ahmed, Assistant United States Attorney; and Kathleen Bliss and Jacqueline Tirinnanzi, counsel for Adam Pacheco, that the Court enter an order, submitted herewith, granting the parties an additional three days within which to file motions and respective responsive pleadings in this Case. The parties show this Court that the date for filing motions is currently March 28, 2023. (ECF 102). A short continuance of three days should not affect the current schedule for trial, set on May 8, 2023. (*Id.*).

23

24

25

26

27

28

## Case 2:19-cr-00248-RFB-DJA Document 115 Filed 03/29/23 Page 2 of 3

1	The parties show the Court that on March 8, 2023, a superseding indictment was filed,
2	extending the timeframe of the conspiracy five years, from 2005, back to 2000. (ECF No. 108).
3	Counsel for Mr. Pacheco has been traveling on other, unrelated cases and needs additional time
4	to address issues for which she believes motions are warranted.
5	The due date for motions would be March 31, 2023, with responsive pleadings on April
6	14, 2023, and any reply briefs due on April 21, 2023. A Master Trial Calendar Scheduling
8	Conference is set on April 18, 2023. (ECF No. 113).
9	Dated this 24 <sup>th</sup> day of March 2023.
10	Dated this 21 day of March 2023.
11	JASON M. FRIERSON United States Attorney
12	
13	/s/ Christopher Burton Assistant United States Attorney  /s/ Nadia Ahmed Assistant United States Attorney  /s/ Kathleen Bliss KATHLEEN BLISS, ESQ. Counsel for Adam Pacheco
14	
15	
16 17	
18	
19	
20	/s/ Jacqueline Tirinnanzi JACQUELINE TIRINNANZI, ESQ. Counsel for Adam Pacheco
21	
22	
23	
24	
25	
26 27	
28	

**ORDER** Based on the stipulation of the parties and for good cause showing, it is hereby ORDERED that the parties' stipulation to a three-day continuance of motions and responsive pleadings is hereby GRANTED. IT IS THEREFORE ORDERED that the parties herein shall have to and including March 31, 2023 to file any and all pretrial motions. IT IS FURTHER ORDERED that the parties shall have to and including April 14, 2023 to file any and all responses. IT IS FURTHER ORDERED that the parties shall have to and including April 21, 2023 to file any and all replies. DATED: March 29, 2023. Honorable Richard F. Boulware II United States District Judge